

5 opposite said first side of said housing;

said shielding plates extend from said base rail toward said middle of said housing.

### REMARKS

Applicant has canceled claims in this Amendment in order to reduce the issues being considered. In particular the rejection of claims 7, 9 and 11 as being anticipated by Itoga is now moot since these claims have been canceled.

Remaining independent claim 12 has been rejected as being obvious over Petra in view of Simmack.

Claim 12 sets forth insulation-piercing terminal contact elements, shielding plates and a base rail connected to the shielding plates. In the embodiment of the present figures, the shielding plates are represented by reference 2, the base rail by reference 3, and the contact elements by reference 10. The contact elements 10 are especially shown in present figures 6 and 7. The rejection indicates that Petra discloses the shielding plates, and Simmack discloses a base rail. Applicant notes that the rejection does not indicate where the contact elements of claim 12 can be found.

Claim 12 also sets forth a specific relationship between the contact elements, the shielding plates and the base rail. Claim 12 sets forth that the base rail is connected to the shielding plates and that the shielding plates are between the contact elements. Applicant finds

no teaching nor suggestion of this specific relationship between contact elements, shielding plates and a base rail in either Petra or Simmack. The rejection equates elements 24 of Petra with the shielding plates of the present invention. Element 6 of Simmack is equated with the base rail of the present invention. Applicant notes that Petra does not describe connecting elements 24 by a base rail, and Simmack also does not describe connecting shielding plates by a base rail. The rejection states that Simmack suggests a plurality of plates 7 extending from element 6. Applicant has reviewed Simmack, and notes that elements 7 are not shielding plates. Instead it appears that element 7 has the function of electrically connecting all of the terminals 4. In particular it appears that elements 6 and 7 are part of a busbar where all the incoming or outgoing wires are connected together. Applicant finds no indication in Simmack or Petra, of using elements 6 and 7 of Simmack to connect shielding plates. Elements 7 and 6 of Simmack are described as connecting all of the incoming or outgoing wires together. Elements 24 of Petra do not connect to incoming or outgoing wires. Therefore a person of ordinary skill would not be led by Simmack to use elements 6 and 7 of Simmack to connect elements 24 of Petra.

Applicant notes that elements 6 and 7 of Petra electrically connect terminals 4 of Simmack. If there is any teaching or suggestion to combine, a person of ordinary skill might be led to use elements 6 and 7 of Simmack to electrically connect elements 28 of Petra which appear to connect to incoming and outgoing wires. Therefore the combination of Petra and Simmack lead a person away from connecting elements 24 of Petra, and instead would lead a person to connect elements 28 of Petra. It is Applicant's position that the combination of Petra and Simmack fail to provide the suggestion or motivation to create the present invention,

especially as set forth in claim 12. Claim 12 therefore defines over Petra and Simmack.

The rejection states that the incentive to combine Petra and Simmack is that the combination would provide a quick assembly process. Applicant notes that U.S. patent regulations require that the incentive or motivation to combine the references be found in the prior art. Applicant finds no indication in the prior art that would suggest to a person of ordinary skill that the combination would provide a quick assembling process. Furthermore, the rejection does not indicate where in the prior art this suggestion or motivation can be found.

As described above, elements 6 and 7 in Simmack is for the purposes of converting the terminal block into a busbar where all the input and output wires are connected together. The purpose of element 6 and 7 is not to form a terminal block with a quick assembling process. This is especially true with regard to a quick assembling process for a terminal block of Petra. Elements 6 and 7 of Simmack only relate to a busbar concept and Applicant finds no teaching nor suggestion in Petra of a busbar concept. Therefore any suggestion for a quick assembly process in Simmack would only be with regard to a busbar, and therefore not applicable to Petra.

While both Petra and Simmack may relate to terminal blocks, they both relate to different aspects of terminal blocks. In particular Petra relates to a terminal block for high transmission rates with shield plates 24, and Simmack relates to a device for converting a terminal block into a busbar for commonly connecting all input and output wires. Since the goal of Simmack is to connect all input and output wires, a person of ordinary skill in the art would not be led to Petra which is trying to shield crosstalk between adjacent wires. The two

references actually lead in opposite directions, since Petra desires to isolate adjacent wires, and Simmack desires to connect all the wires. Simmack provides no suggestion or motivation to connect shielding plates in high transmission rate terminal blocks. Furthermore, Applicant finds no indication in Petra that connecting all of elements 24 with a base rail would be desirable, or that a quick assembly process would be desirable. Therefore a person of ordinary skill in the art would not be led to combine Simmack and Petra to create the present invention. Furthermore the incentive of a quick assembling process is not found in the prior art, or the common knowledge, as required by U.S. patent regulations. Claim 12 and its dependent claims therefore define over the prior art.

Claim 13 sets forth that the shielding plates are spaced from the insulation-piercing terminal contact elements. Applicant notes that plates 7 of Simmack are indicated as being in contact, especially electrical contact, with terminals 4. Simmack therefore leads a person away from using plates 7 as shielding plates.

Claim 14 sets forth that the shielding plates are electrically insulated from the insulation-piercing terminal contact elements. Simmack clearly teaches the exact opposite by showing that plates 7 are to be electrically connected to terminals 4. Claim 14 therefore further defines over the prior art.

Claim 25 sets forth that the insulation-piercing terminal contact elements are arranged on the first side of the housing and extend toward a middle of the housing. The base rail is set forth as being arranged on the second side of the housing substantially diametrically opposite the first side of the housing. The shielding plates are then set forth as extending from the base


rail toward the middle of the housing. Applicant notes that it appears from Simmack that elements 5 and 6 are arranged on the same side of a housing as terminals 4. Therefore the arrangement of elements 4, 6 and 7 of Simmack lead away from the embodiment of Fig. 25.

While the prior art of Petra and Simmack may appear to have all of the individual features of claim 12, one of the more significant differences, is that plates 7 of Simmack are not shielding plates, and in fact are used more like connecting plates. Applicant notes that the courts have decided that hindsight along with simplicity can make an invention appear obvious. Therefore the courts have decided that the suggestion or motivation to modify a reference must be found in the prior art or the common knowledge of a person of ordinary skill. When viewed in this light, the teachings of structure to create a busbar and combine wires, would not be applied to a high transmission rate terminal block where the goal is to keep the signals separate. It is only inventive activity that has indicated to provided structure to connect shielding plates, and especially a connection structure that is simple in design economical to manufacture and easy to use. It is Applicant's position that the application of a base rail with twisted webs to a plurality of shielding plates used between insulation-piercing terminal contact elements is unique and not suggested by any of the prior art. It is only the Applicant who has discovered that such structure would be beneficial in a terminal block with a plurality of shielding plates. Applicant respectfully requests patent protection for this improvement.

If the Examiner has any comments or suggestions which would further favorable prosecution of this application, the Examiner is invited to contact Applicant's representative by telephone to discuss possible changes.

At this time Applicant respectfully requests reconsideration of this application, and based on the above amendments and remarks, respectfully solicits allowance of this application.

Respectfully submitted  
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